Louisville Metro Air Pollution Control District

850 Barret Ave., Louisville, Kentucky 40204

26 June 2013

Title V Statement of Basis

Company: United Parcel Service, Inc.

Plant Location: 911 Grade Lane, Louisville, KY 40213

Date Application Received: 9/30/2005
9/27/2010
5/04/2012

Date Administratively Complete: 11/30/2005

Date of Draft Permit: 07 February 2012

Date of Proposed Permit: 07 February 2013
29 April 2013

District Engineer: Diana Prentice

Permit No: 146-97-TV (R1)

Plant ID: 564 **SIC Code:** 4215 **NAICS**: 49211 **AFS:** 00564

Introduction:

This permit will be issued pursuant to: (1) District Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide methods of determining continued compliance with these requirements.

Jefferson County is classified as an attainment area for lead (Pb), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), carbon monoxide (CO), 1 hr and 8 hr ozone (O_3), and particulate matter less than 10 microns (PM_{10}); and is a non-attainment area for particulate matter less than 2.5 microns ($PM_{2.5}$).

Application Type/Permit Activity:

[ ] Initial Issuance
[ ] Permit Revision
  [ ] Administrative
  [ ] Minor
  [ ] Significant
[X] Permit Renewal
[ ] Construction

Compliance Summary:

[X] Compliance certification signed
[ ] Source is out of compliance
[ ] Compliance schedule included
[X] Source is operating in compliance

I. Source Information

1. Product/Process Description: The source ships packages worldwide.

2. Process Description: The source receives, sorts, and distributes packages around the world.

3. Site Determination: There are no other facilities that are contiguous or adjacent and under common control.

4. Emission Unit Summary:

a. **U1:** Hangar

b. **U3:** Ground Support Equipment (GSE)

c. **U4:** Fuel Farm**Error! Bookmark not defined.**

d. **U5:** Fuel Dispensing

e. **U6:** Grade Lane Utility Building

f. **U7:** Utility Building

g. **U8:** GOC Building

h. **U9:** Wheel and Brake Shop

i. **IA1:** Boiler Group

j. **IA2:** Emergency Generator Group

k. **IA3:** Cold cleaners group

5. Permit Revisions

Revision No.	Date or Reissuance	Public Notice Date	Type	Emission Unit	Description
Initial	N/A	06/25/2000	N/A	Entire Permit	Initial issuance that was proposed to EPA
R1	06/26/2013	02/07/2013	Renewal	Entire Permit	Renewal; incorporate STAR TAC requirements, construction permits 78-04-C, 111-08-C, 107-08-C, 108-08-C,

					109-08-C, 110-08-C, 112-08-C, 318-08-C, 435-05-C, 123-02-C, 35442-12-C, and 35811-12-C. Note

Note: The District removed the following equipment permanently taken out of service on 3/8/13: E30, E33, E35, E38 (Emission Unit U9).

6. Fugitive Sources: Fugitive emissions of dust from any part of the plant are subject to Regulation 1.14, *Control of Fugitive Particulate Emissions*.

7. Plantwide Emission Summary:

Pollutant	District Calculated Actual Emissions 2010 Data (tpy)	Major Source Status (based on PTE)
CO	3.95	No
NO_x	7.165	Yes
SO_2	0.275	No
PM/PM_{10}	6.247/5.615	No
VOC	22.90	Yes
Xylene	2.49	Yes[1]
Total HAPs	6.218	Yes[1]
CO_2	10,090	No[2]

[1]The source accepted limits on single and total HAP emissions in order to be a synthetic minor source.
[2]The CO_2 emissions are potential, not actual.

8. Applicable Requirements:

[ ] PSD	[X] NSPS	[X] SIP	[X] MACT
[ ] NSR	[ ] NESHAPS	[X] District-Origin	[ ] Other

9. MACT Requirements:

This source is subject to the following MACT regulations:

40 CFR 63 Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)

40 CFR 63 Subpart CCCCCC	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities
40 CFR 63 Subpart HHHHHH	National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

10. Referenced Federal Regulations in Permit:

40 CFR 60 Subpart A	General Provisions
40 CFR 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984
40 CFR 60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 CFR 68 Subparts A through H	Chemical Accident Prevention Provisions

II. Regulatory Analysis

1. Acid Rain Requirements: The source is not subject to the Acid Rain Program.

2. Stratospheric Ozone Protection Requirements: Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.

3. Prevention of Accidental Releases 112(r): The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount. If the source becomes subject to 40 CFR 68 and Regulation 5.15, the source shall comply with the Risk Management Program and Regulation 5.15 and submit a Risk Management Plan to:

RMP Reporting Center
P.O. Box 3346
Merrifield, VA 22116-3346

4. Basis of Regulation Applicability

Regulation	Title	Type
1.10	Circumvention	SIP
1.11	Control of Open Burning	SIP
1.12	Control of Nuisances	Local
1.13	Control of Objectionable Odors in the Ambient Air	Local
1.14	Control of Fugitive Particulate Emissions	SIP
1.20	Upset Condition Prevention Programs	Local
2.01	General Application	SIP
2.02	Air Pollution Regulation Requirements and Exemptions	SIP
2.03	Permit Requirements – Non-Title V Construction and Operating Permits and Demolition/Renovation Permits	SIP
2.05	Prevention of Significant Deterioration of Air Quality	SIP
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits	SIP
2.08	Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Program Fees	Local
2.09	Causes for Permit Modification, Revocation, or Suspension	SIP
2.10	Stack Height Considerations	SIP
2.11	Air Quality Model Usage	SIP
2.16	Title V Operating Permits	SIP
4.01	General Provisions for Emergency Episodes	SIP
4.02	Episode Criteria	SIP
4.03	General Abatement Requirements	SIP
4.07	Episode Reporting Requirements	SIP
5.00	Standards for Toxic Air Contaminants and Hazardous Air Pollutants	Local
5.01	General Provisions	SIP
5.02	Federal Emission Standards for Hazardous Air Pollutants Incorporated by Reference	Local
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	Local
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	Local
5.14	Hazardous Air Pollutants and Source Categories	Local
5.15	Chemical Accident Prevention Provisions	Local

5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	Local
5.21	Environmental Acceptability for Toxic Air Contaminants	Local
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	Local
5.23	Categories of Toxic Air Contaminants	Local
6.01	General Provisions (for *Existing Affected Facilities*)	SIP
6.02	Emission Monitoring for Existing Sources	SIP
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	SIP
6.40	Standards of Performance for Gasoline Transfer to Motor Vehicles (Stage II Vapor Recovery)	SIP
6.44	Standards of Performance for Existing Commercial Motor Vehicle and Mobile Equipment Refinishing Operations	SIP
7.01	General Provisions (for *New Affected Facilities*)	SIP
7.02	Federal New Source Performance Standards Incorporated by Reference	SIP
7.08	Standards of Performance for New Process Operations	SIP
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	SIP
7.15	Standards of Performance for Gasoline Transfer to New Service Station Storage Tanks (Stage I Vapor Recovery)	SIP
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	SIP
7.59	Standards of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	SIP

a. Plant-wide

i. The source shall limit each single plantwide HAP emissions to less than 10 tons per 12 consecutive month period.

ii. The owner or operator shall limit the total plantwide HAP emissions to less than 25 tons per 12 consecutive month period.

iii. These HAP emission limits were taken to avoid applicability of 40 CFR 63 Subpart FFFF *Miscellaneous Organic NESHAP(MON).*

The limits will ensure that the source remains a synthetic minor source for HAPs.

iv. For the Miscellaneous Non-Point Sources, the owner or operator shall comply with the following emission limits:

TAC	Limit (lb/yr)
Cadmium	10.22
Chromium (trivalent)	4,240
Chromium (hexavalent)	1.56
Carbon tetrachloride	1,210

Based on Tier 3 (Screen3) air dispersion modeling using the emission limits specified in this permit, the carcinogenic risk for each Category 1 TAC is below 1.0 for non-industrial property and below 10.0 for industrial property with the emission limits specified in this permit. The carcinogenic risk for all Category 1 TACs for all processes is below 7.5 for nonindustrial property and below 75.0 for industrial property. The following Table represents the Carcinogenic Risk or EAGC for each Category 1 TAC based on the maximum off-site concentration predicted from the Screen3 air dispersion modeling runs. Since the maximum off-site Carcinogenic Risk meets the more stringent non-industrial RC of < 1.0 for individual process/process equipment and the plant-wide cumulative risk is < 7.5, the source has demonstrated compliance with the EA Goals for all Category 1 TACs. For Emission Point E1, the source requested an emission limit of 30 lbs/yr for formaldehyde in order for this Emission Point to be de minimis. Category 2 TACs are de minimis at their potential.

v. Regulations 5.00 and 5.21 (STAR Program) establishes requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards. The owner or operator shall not allow any TAC emissions to exceed environmentally acceptable levels whether specifically established by modeling or derived from default *de minimis* levels. (Regulations 5.00 and 5.21)

vi. The source is not major for Greenhouse Gases (GHGs).

b. Emission Unit U1

i. Equipment

U1 Emission Points			
Emission	Description	Applicable	Basis for Applicability

Point		Regulation(s)	
E1	One (1) hangar composite parts repair booth/table clean room configuration. Make: Custom, Model: Custom, Installed: 1990.	5.00 5.01 5.02 5.20 5.21 5.22 5.23 7.08 7.59	Regulation 5.00 establishes definitions of terms used in the Strategic Toxic Air Reduction Program. Regulation 5.01 establishes general provisions for process equipment from which a toxic air contaminant is or may be emitted. Regulation 5.02 establishes the adoption and incorporation by reference of national emission standards for hazardous air pollutants. Regulation 5.20 establishes the methodology for determining the benchmark ambient concentration of a toxic air contaminant. Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants. Regulation 5.22 establishes the procedures for determining the maximum ambient concentration of a toxic air contaminant. Regulation 5.23 establishes categories of toxic air contaminants. Regulation 7.08 applies to an affected facility not otherwise regulated by other regulations of Regulation 7 that commenced construction after September 1, 1976. Regulation 7.59 applies to new miscellaneous metal parts and products surface coating operations commenced on or after May 20, 1981.
E2	One (1) paint booth in hangar area. Make: Binks, Model: N/A, Installed: 2002.	5.00 5.01 5.02 5.20 5.21 5.22 5.23 7.08 7.25 40 CFR 63, Subpart	Regulation 5.00 establishes definitions of terms used in the Strategic Toxic Air Reduction Program. Regulation 5.01 establishes general provisions for process equipment from which a toxic air contaminant is or may be emitted.

		HHHHHH	Regulation 5.02 establishes the adoption and incorporation by reference of national emission standards for hazardous air pollutants. Regulation 5.20 establishes the methodology for determining the benchmark ambient concentration of a toxic air contaminant. Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants. Regulation 5.22 establishes the procedures for determining the maximum ambient concentration of a toxic air contaminant. Regulation 5.23 establishes categories of toxic air contaminants. Regulation 7.08 applies to an affected facility not otherwise regulated by other regulations of Regulation 7 that commenced construction after September 1, 1976. Regulation 7.25 establishes VOC standards for affected facilities constructed after June 13, 1979. 40 CFR 63, Subpart HHHHHH applies to an area source of HAP that either performs paint stripping using MeCl, performs spray application of coatings to motor vehicles and mobile equipment, or performs spray application of coatings that contain target HAP.
E42	Hangar fire pump 1. Make: Cummins, Model: NT855F3. Installed: 1989.	5.00 5.01 5.02 5.20 5.21 5.22 5.23	Regulation 5.00 establishes definitions of terms used in the Strategic Toxic Air Reduction Program. Regulation 5.01 establishes general provisions for process equipment from which a toxic air contaminant is or may be emitted. Regulation 5.02 establishes the adoption and incorporation by reference of national emission standards for hazardous air pollutants.
E43	Hangar fire pump 2. Make: Cummins, Model: NT855F3. Installed: 1989		
E44	Hangar fire pump 3. Make: Cummins, Model: NT855F3. Installed: 1989		
E45	Hangar fire pump 4. Make: Cummins, Model: NT855F3. Installed: 1989		

E46	Hangar fire pump 5. Make: Cummins, Model: NT855F3. Installed: 1989		Regulation 5.20 establishes the methodology for determining the benchmark ambient concentration of a toxic air contaminant. Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants. Regulation 5.22 establishes the procedures for determining the maximum ambient concentration of a toxic air contaminant. Regulation 5.23 establishes categories of toxic air contaminants.
E47	Hangar fire pump 6. Make: Cummins, Model: NT855F3. Installed: 1989		

ii. Standards/Operating Limits

1) VOC

a) Regulation 7.25 limits the VOC emissions from E2 and E34 to 5 tons per year.

b) Regulation 7.59 establishes VOC emission limits from E1 to less than 5 tons per year or no coating shall be applied with a VOC content (lb/gal) in excess of the following limits: 4.3 for clear coatings, 3.5 for air-dried coatings, 3.5 for extreme performance coatings, and 3.0 for all other coatings.

2) Opacity

Regulation 7.08 limits visible emissions to 20% opacity.

3) PM

Regulation 7.08 limits PM emissions to 2.34 lb/hr for each emission point in the emission unit based on the throughput rate of the equipment being less than 1000 lb/hr. (Using the minimum spray gun transfer efficiency of 35%, the percent solids of the material (45.9%), and the efficiency of the filters (greater than 90%), the PM emission limit of the spray booth cannot be exceeded.)

4) HAP

For emission point E2: 40 CFR 63, Subpart HHHHHH requires that the owner or operator certifies all new and existing personnel are trained in the proper application of surface coatings and the proper setup and maintenance of spray equipment. In addition, all spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure and be applied with a HVLP gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or equivalent technology. Emission point E1 does not apply coating utilizing a spray method, therefore, the area source MACT does not apply to this emission point.

5) TAC

Per Regulations 5.00 and 5.21, the owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. In addition, emissions of formaldehyde from Emission Point E1 are limited to de minimis and emissions of hexavalent chromium from Emission Point E2 are limited to 0.688 pounds per year. (Based on Tier 3 (Screen3) air dispersion modeling using the emission limits specified in this permit, the carcinogenic risk for each Category 1 TAC is below 1.0 for non-industrial property and below 10.0 for industrial property with the emission limits specified in this permit. The carcinogenic risk for all Category 1 TACs for all processes is below 7.5 for nonindustrial property and below 75.0 for industrial property. The following Table represents the Carcinogenic Risk or EAGC for each Category 1 TAC based on the maximum off-site concentration predicted from the Screen3 air dispersion modeling runs. Since the maximum off-site Carcinogenic Risk meets the more stringent non-industrial RC of < 1.0 for individual process/process equipment and the plant-wide cumulative risk is < 7.5, the source has demonstrated compliance with the EA Goals for all Category 1 TACs. Category 2 TACs are de minimus at their potential.)

iii. Monitoring and Record Keeping

Emissions Calculation Methodology: The emissions from the paint booths are based on VOC and HAP content of the materials used. The emissions from the fire pumps are calculated using AP-42 emission factors.

1) VOC

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. Records shall be kept of the amount and type of coatings applied as well as method used on a monthly basis.

2) Opacity

Regulation 7.08 does not require specific monitoring requirements for PM, however Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

3) PM

Regulation 7.08 does not require specific monitoring requirements for PM, however Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

4) HAP

For emission point E2: 40 CFR 63, Subpart HHHHHH requires that records be kept of the training each painter has completed, documentation of the filter efficiency, and documentation from the spray gun manufacturer of each spray gun that does not meet the definition of a HVLP spray gun that it achieves a similar transfer efficiency.

5) TAC

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. Records shall be maintained of each coating that contains formaldehyde for Emission Point E1 and the total pounds of formaldehyde emitted during each calendar month shall be calculated. In addition, records shall be maintained of each coating that contains hexavalent chromium for Emission Point E2 and the total pounds of hexavalent chromium emitted during each calendar month shall be calculated.

iv. Reporting

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

HAP

40 CFR 63, Subpart HHHHHH requires the owner or operator to submit an annual notification of changes report.

c. Emission Unit U3

i. Equipment

U3 Emission Points			
Emission Point	Description	Applicable Regulation(s)	Basis for Applicability
E4	Paint Booth. Make: JBI, Model: 754-PSB Special, Installed: 1988.	5.00 5.01 5.02 5.20 5.21 5.22 5.23	Regulation 5.00 establishes definitions of terms used in the Strategic Toxic Air Reduction Program. Regulation 5.01 establishes general provisions for process equipment from which a toxic air contaminant is or may be emitted. Regulation 5.02 establishes the adoption and incorporation by reference of national emission standards for hazardous air pollutants. Regulation 5.20 establishes the methodology for determining the benchmark ambient concentration of a toxic air contaminant. Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants. Regulation 5.22 establishes the procedures for determining the maximum ambient concentration of a toxic air contaminant. Regulation 5.23 establishes categories of toxic air contaminants.
		6.44	Regulation 6.44 applies to existing commercial motor vehicle and mobile equipment refinishing operations.

		7.08	Regulation 7.08 applies to an affected facility not otherwise regulated by other regulations of Regulation 7 that commenced construction after September 1, 1976.
		40 CFR 63, Subpart HHHHHH	40 CFR 63, Subpart HHHHHH applies to an area source of HAP that either performs paint stripping using MeCl, performs spray application of coatings to motor vehicles and mobile equipment, or performs spray application of coatings that contain target HAP.

ii. Standards/Operating Limits

1) VOC

Regulation 6.44 requires coatings to be limited to specified VOC content limits, unless specific conditions are met. Specialty coatings are limited to 7.0 lb/gal VOC content and shall not exceed 10% of all coatings applied and surface cleaners are limited to 1.7 lb/gal VOC content.

2) Opacity

Regulation 7.08 limits visible emissions to 20% opacity.

3) PM

a) Regulation 6.44 requires that spray booth filters have a minimum efficiency of 90% on particulates, spraying equipment shall have a a minimum transfer efficiency of 65% at 8" from the work surface.

b) Regulation 7.08 limits PM emissions to 2.34 lb/hr for each emission point in the emission unit. (Using the minimum spray gun transfer efficiency of 35%, the percent solids of the material (45.9%), and the efficiency of the filters (greater than 90%), the PM emission limit of the spray booth cannot be exceeded.)

4) HAP

40 CFR 63, Subpart HHHHHH requires that the owner or operator certifies all new and existing personnel are trained in the proper application of surface coatings and the proper setup and maintenance of spray equipment. In addition, all

spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure and be applied with a HVLP gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or equivalent technology.

5) TAC

Per Regulations 5.00 and 5.21, the owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis.

iii. Monitoring and Record Keeping

Emissions Calculation Methodology: The emissions from the paint booth are based on VOC and HAP content of the materials used.

1) VOC

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. Records shall be kept of the amount and type of coatings applied as well as method used on a monthly basis.

2) Opacity

Regulation 7.08 does not require specific monitoring requirements for PM, however Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

3) PM

Regulation 7.08 does not require specific monitoring requirements for PM, however Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

4) HAP

40 CFR 63, Subpart HHHHHH requires that records be kept of the training each painter has completed, documentation of the filter efficiency, and documentation from the spray gun manufacturer of each spray gun that does not meet the

definition of a HVLP spray gun that it achieves a similar transfer efficiency.

5) TAC

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. Records shall be kept of MSDS, analysis of emissions and/or modeling results that demonstrate environmental acceptability. In addition, if a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

v. Reporting

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

HAP

40 CFR 63, Subpart HHHHHH requires the owner or operator to submit an annual notification of changes report.

d. **Emission Unit U4**

i. Equipment

U4 Emission Points			
Emission Point	Description	Applicable Regulation(s)	Basis for Applicability
E6	Jet-A Tank (500,000 gal). Installed: 1985.	5.00 5.01 5.02 5.20 5.21 5.22 5.23 7.12 40 CFR 60 Subpart Kb	Regulation 5.00 establishes definitions of terms used in the Strategic Toxic Air Reduction Program. Regulation 5.01 establishes general provisions for process equipment from which a toxic air contaminant is or may be emitted. Regulation 5.02 establishes the adoption and incorporation by reference of national emission standards for hazardous air pollutants. Regulation 5.20 establishes the methodology for determining the benchmark ambient concentration of a
E7	Jet-A Tank (230,000 gal). Installed: 1983.		
E26	Jet-A Tank (1,000,000 gal). Installed: 2002.		
E27	Jet-A Tank (1,000,000 gal). Installed: 2002.		

			toxic air contaminant. Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants. Regulation 5.22 establishes the procedures for determining the maximum ambient concentration of a toxic air contaminant. Regulation 5.23 establishes categories of toxic air contaminants. VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972. 40 CFR Subpart Kb applies to storage vessels of volatile organic liquids which have a design capacity of 19,800 gal or greater, construction commenced after July 23, 1984, and a maximum true vapor pressure 15.0 kPa or greater.
E8	Jet-A Recovery Tank (3,000 gal). Installed: 1994.	5.00 5.01 5.02 5.20 5.21 5.22 5.23 7.12	Regulation 5.01 establishes general provisions for process equipment from which a toxic air contaminant is or may be emitted. Regulation 5.02 establishes the adoption and incorporation by reference of national emission standards for hazardous air pollutants. Regulation 5.20 establishes the methodology for determining the benchmark ambient concentration of a toxic air contaminant. Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants. Regulation 5.22 establishes the procedures for determining the maximum ambient concentration of a toxic air contaminant. Regulation 5.23 establishes categories of toxic air contaminants. VOC storage tanks greater than 250
E9	Jet-A Dispensing. Installed: 1983		

			gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.
E48	East Fuel Farm Generator. Make: Caterpillar, Model: LC6. Installed: 2008.	5.00 5.01 5.02 5.20 5.21 5.22 5.23 40 CFR 60 Subpart IIII 40 CFR 63 Subpart ZZZZ	Regulation 5.00 establishes definitions of terms used in the Strategic Toxic Air Reduction Program. Regulation 5.01 establishes general provisions for process equipment from which a toxic air contaminant is or may be emitted. Regulation 5.02 establishes the adoption and incorporation by reference of national emission standards for hazardous air pollutants. Regulation 5.20 establishes the methodology for determining the benchmark ambient concentration of a toxic air contaminant. Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants. Regulation 5.22 establishes the procedures for determining the maximum ambient concentration of a toxic air contaminant. Regulation 5.23 establishes categories of toxic air contaminants. 40 CFR 60 Subpart IIII applies to stationary compression ignition internal combustion engines that commenced construction after July 11, 2005. 40 CFR 63, Subpart ZZZZ applies to a major or area source of HAP emissions that owns or operates a stationary RICE, except if the stationary RICE is being tested at a stationary RICE test cell/stand.
E49	West Fuel Farm Generator. Make: Cummins, Model: NTTA855GS2. Installed: 1989.	5.00 5.01 5.02 5.20 5.21 5.22 5.23	Regulation 5.00 establishes definitions of terms used in the Strategic Toxic Air Reduction Program. Regulation 5.01 establishes general provisions for process equipment

			from which a toxic air contaminant is or may be emitted. Regulation 5.02 establishes the adoption and incorporation by reference of national emission standards for hazardous air pollutants. Regulation 5.20 establishes the methodology for determining the benchmark ambient concentration of a toxic air contaminant. Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants. Regulation 5.22 establishes the procedures for determining the maximum ambient concentration of a toxic air contaminant. Regulation 5.23 establishes categories of toxic air contaminants.

ii. Standards/Operating Limits

1) VOC

a) Regulation 7.12 requires that the owner or operator shall not store materials with an as stored vapor pressure of greater than or equal to 1.5 psia in Emission Points E6, E7, E8, E9, E26, and E27.

b) 40 CFR 60 Subpart IIII requires the owner or operator shall limit the total emissions of VOC and NO_x combined to 4.0 g/kW-hr for Emission Point E48.

2) HAP

40 CFR 60 Subpart IIII limits the operation of E48 to one hundred (100) hours in any calendar year for maintenance and testing. In addition, the owner or operator may operate up to 50 hours for non-emergency situations, but those hours must be counted towards the 100 hours per year for maintenance and testing. There is no time limit for use in emergency situations.

3) Unit Operation

40 CFR 60 Subpart IIII requires that for Emission Point E48 the owner or operator shall purchase an engine certified to the emission standards in §60.4205(b) for Emission Point E48, as applicable for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications.

4) NO_x

a) 40 CFR 60 Subpart IIII limits the total emissions of VOC and NO_x combined from Emission Point E48 to 4.0 g/kW-hr.

b) The plantwide total emissions of NO_x is limited to 248 tons per year in order to avoid being subject to the requirements of Regulation 2.04. (This limit was established in 146-97-TV.)

5) PM

40 CFR 60 Subpart IIII limits the emissions of PM from Emission Point E48 to 0.2 g/kW-hr.

6) Opacity

40 CFR 60 Subpart IIII limits Emission Point E48 to 20 percent opacity during the acceleration mode, 15 percent during the lugging mode, and 50 percent during the peaks in either the acceleration or lugging modes.

7) TAC

Per Regulations 5.00 and 5.21, the owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis.

iii. Monitoring and Record Keeping

Emissions Calculation Methodology: The VOC storage tanks emissions are based upon the VOC content of the stored material and the amount of material in the tank. The emissions from the generators are calculated using AP-42 emission factors.

1) VOC

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

2) HAP

40 CFR 63, Subpart ZZZZ requires records to be kept of each unit's running time, the oil and filter shall be changed every 500 hours of operation or annually, the air cleaner shall be inspected every 1,000 hours of operation or annually, the hoses and belts must be inspected every 500 hours of operation or annually, and records shall be kept of the malfunctions and performance tests and evaluations.

3) Unit Operation

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit for emission point E48.

4) NO_x

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

5) PM

Regulation 7.08 does not require specific monitoring requirements for PM, however Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

6) Opacity

Regulation 7.08 does not require specific monitoring requirements for PM, however Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

7) TAC

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. Records shall be kept of MSDS, analysis of emissions and/or modeling results

that demonstrate environmental acceptability. In addition, if a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

iv. Reporting

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

e. Emission Unit U5

i. Equipment

U5 Emission Points			
Emission Point	Description	Applicable Regulation(s)	Basis for Applicability
E10	Ashbottom Hub – Gas Tank (12,000 gal). Installed: 1993.	5.00 5.01 5.02 5.20 5.21 5.22 5.23 7.15 40 CFR 63 Subpart CCCCCC	Regulation 5.00 establishes definitions of terms used in the Strategic Toxic Air Reduction Program. Regulation 5.01 establishes general provisions for process equipment from which a toxic air contaminant is or may be emitted. Regulation 5.02 establishes the adoption and incorporation by reference of national emission standards for hazardous air pollutants. Regulation 5.20 establishes the methodology for determining the benchmark ambient concentration of a toxic air contaminant. Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants. Regulation 5.22 establishes the procedures for determining the maximum ambient concentration of a toxic air contaminant. Regulation 5.23 establishes categories of toxic air contaminants. Regulation 7.15 applies to the transfer
E12	Grade Lane Hub – Gas Tank (12,000 gal). Installed: 1993.		

			of VOCs from transport vehicle tanks into storage tanks at new service stations constructed or reconstructed after June 13, 1979. 40 CFR 63 Subpart CCCCCC applies to the loading of gasoline storage tanks at gasoline dispensing facilities.
E14	309.7 gal/hr Fuel Dispensing Operation (Gas). Installed: 1993.	5.00 5.01 5.02 5.20 5.21 5.22 5.23 6.40 40 CFR 63 Subpart CCCCCC	Regulation 5.00 establishes definitions of terms used in the Strategic Toxic Air Reduction Program. Regulation 5.01 establishes general provisions for process equipment from which a toxic air contaminant is or may be emitted. Regulation 5.02 establishes the adoption and incorporation by reference of national emission standards for hazardous air pollutants. Regulation 5.20 establishes the methodology for determining the benchmark ambient concentration of a toxic air contaminant. Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants. Regulation 5.22 establishes the procedures for determining the maximum ambient concentration of a toxic air contaminant. Regulation 5.23 establishes categories of toxic air contaminants. Regulation 6.40 applies to the refueling of motor vehicles at a gasoline dispensing facility. 40 CFR 63 Subpart CCCCCC applies to the loading of gasoline storage tanks at gasoline dispensing facilities.
E11	Ashbottom Hub – Diesel Tank (12,000 gal). Installed: 1993.	5.00 5.01 5.02 5.20 5.21	Regulation 5.00 establishes definitions of terms used in the Strategic Toxic Air Reduction Program.
E13	Grade Lane Hub – Diesel Tank (12,000 gal). Installed: 1997.		

E15	602.5 gal/hr Fuel Dispensing Operation (Diesel). Installed: 1993.	5.22 5.23 7.12	Regulation 5.01 establishes general provisions for process equipment from which a toxic air contaminant is or may be emitted. Regulation 5.02 establishes the adoption and incorporation by reference of national emission standards for hazardous air pollutants. Regulation 5.20 establishes the methodology for determining the benchmark ambient concentration of a toxic air contaminant. Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants. Regulation 5.22 establishes the procedures for determining the maximum ambient concentration of a toxic air contaminant. Regulation 5.23 establishes categories of toxic air contaminants. VOC storage tanks greater than 250 gallon capacity are subject to Regulation 7.12 for VOC which were installed after April 19, 1972.

ii. Standards/Operating Limits

1) VOC

a) Regulation 6.40 requires that Emission Point E14 be a CARB-certified system and shall be maintained in good working order. In addition, at least one person shall be trained in the operation and maintenance of the vapor recovery system. Stage II systems must meet specified equipment and certification requirements as well as specific equipment maintenance.

b) Per Regulation 7.15, the owner or operator of Emission Points E10 and E12 shall install, maintain, and operate the following devices on the storage tank: submerged fill pipe, vent line restrictions, vapor balance system, and vapor tight connections. The equipment shall be maintained with no defects and with vapor-tight seals and covers.

c) Regulation 7.12, section 3.3 requires Emission Points E11, E13, and E15 be submerged fill if the materials have an as stored vapor pressure of 1.5 psia or greater.

2) HAP

40 CFR 63 Subpart CCCCCC requires that good safety and air pollution control practices be used for Emission Points E10, E12, and E14 as well as not allowing gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Submerged filling must be used. A vapor balance system must be installed and operated on Emission Points E12 and E14. (The source submitted notification of compliance with 40 CFR 63 Subpart CCCCCC to the District on October 31, 2010.)

3) TAC

Per Regulations 5.00 and 5.21, the owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis.

iii. Monitoring and Record Keeping

Emissions Calculation Methodology: The VOC storage tanks emissions are based upon the VOC content of the stored material and the amount of material in the tank. The VOC emissions from the gasoline dispensing facility is based upon the VOC content.

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. A record shall be kept of materials stored, the corresponding vapor pressure, and any change in the contents stored.

1) VOC

Regulation 6.40 requires records to be kept of training of facility representatives as well as of maintenance and repair records for Emission Point E14. Records of maintenance and repair are required to be kept daily as required by regulations 6.40.

2) HAP

40 CFR 63 Subpart CCCCCC requires records to be kept of gasoline throughput, malfunctions, and any corrective actions taken for Emission Points E10, E12, and E14.

3) TAC

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. Records shall be kept of MSDS, analysis of emissions and/or modeling results that demonstrate environmental acceptability. In addition, if a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

vi. Reporting

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

HAP

40 CFR 63 Subpart CCCCCC requires reports be submitted within 180 days of completion of performance testing. In addition, malfunctions must be reported as well as any corrective actions taken.

f. Emission Unit U6

i. Equipment

U6 Emission Points			
Emission Point	Description	Applicable Regulation(s)	Basis for Applicability
E16	2,584 Hp Low Speed/Continuous Duty Back-up Generator. Make: Caterpillar, Model: 3516 DITA. Installed: 1988.	5.00 5.01 5.02 5.20 5.21 5.22 5.23	Regulation 5.00 establishes definitions of terms used in the Strategic Toxic Air Reduction Program. Regulation 5.01 establishes general provisions for process equipment from which a toxic air contaminant is or may be emitted. Regulation 5.02 establishes the adoption and incorporation by reference of national emission standards for hazardous air pollutants. Regulation 5.20 establishes the
E17	2,584 Hp Low Speed/Continuous Duty Back-up Generator. Make: Caterpillar, Model: 3516 DITA. Installed: 1988.		
E18	2,584 Hp Low Speed/Continuous Duty Back-up Generator. Make: Caterpillar, Model: 3516 DITA. Installed: 1988.		
E19	2,584 Hp Low Speed/Continuous Duty Back-up Generator. Make: Caterpillar, Model: 3516 DITA. Installed: 1988.		

E20	2,584 Hp Low Speed/Continuous Duty Back-up Generator. Make: Caterpillar, Model: 3516 DITA. Installed: 1997.		methodology for determining the benchmark ambient concentration of a toxic air contaminant. Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants. Regulation 5.22 establishes the procedures for determining the maximum ambient concentration of a toxic air contaminant. Regulation 5.23 establishes categories of toxic air contaminants.
E50	Grade Lane Fire Pump. Make: Cummins, Model: NT855F3. Installed: 1989.		

ii. Standards/Operating Limits

TAC

Per Regulations 5.00 and 5.21, the owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis.

iii. Monitoring and Record Keeping

Emissions Calculation Methodology: The emissions from the generators are calculated using AP-42 emission factors.

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

TAC

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. Records shall be kept of MSDS, analysis of emissions and/or modeling results that demonstrate environmental acceptability. In addition, if a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

iv. Reporting

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

g. Emission Unit U7

i. Equipment

U7 Emission Points			
Emission Point	Description	Applicable Regulation(s)	Basis for Applicability
E22	2,200 Hp Low Speed/Continuous Duty Back-up Generator. Make: Caterpillar, Model: 3516 DITA. Installed: 2004.	5.00 5.01 5.02 5.20 5.21 5.22 5.23	Regulation 5.00 establishes definitions of terms used in the Strategic Toxic Air Reduction Program. Regulation 5.01 establishes general provisions for process equipment from which a toxic air contaminant is or may be emitted. Regulation 5.02 establishes the adoption and incorporation by reference of national emission standards for hazardous air pollutants. Regulation 5.20 establishes the methodology for determining the benchmark ambient concentration of a toxic air contaminant. Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants. Regulation 5.22 establishes the procedures for determining the maximum ambient concentration of a toxic air contaminant. Regulation 5.23 establishes categories of toxic air contaminants.
E23	2,200 Hp Low Speed/Continuous Duty Back-up Generator. Make: Caterpillar, Model: 3516 DITA. Installed: 2004.		
E51	WFF Fire Pump. Make: Perkins, Model: YB70379. Installed: 2000.		

ii. Standards/Operating Limits

TAC

Per Regulations 5.00 and 5.21, the owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis.

iii. Monitoring and Record Keeping

Emissions Calculation Methodology: The emissions were calculated using AP-42 emission factors.

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

TAC

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. Records shall be kept of MSDS, analysis of emissions and/or modeling results that demonstrate environmental acceptability. In addition, if a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

iv. Reporting

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

h. Emission Unit U8

i. Equipment

U8 Emission Points			
Emission Point	Description	Applicable Regulation(s)	Basis for Applicability
E28	2,200 Hp Low Speed/Continuous Duty Back-up Generator. Make: Caterpillar, Model: 3516 DITA. Installed: 2000.	5.00 5.01 5.02 5.20 5.21 5.22 5.23	Regulation 5.00 establishes definitions of terms used in the Strategic Toxic Air Reduction Program. Regulation 5.01 establishes general provisions for process equipment from which a toxic air contaminant is or may be emitted. Regulation 5.02 establishes the adoption and incorporation by reference of national emission standards for hazardous air pollutants. Regulation 5.20 establishes the methodology for determining the benchmark ambient concentration of a toxic air contaminant. Regulation 5.21 establishes the

			criteria for determining the environmental acceptability of emissions of toxic air contaminants. Regulation 5.22 establishes the procedures for determining the maximum ambient concentration of a toxic air contaminant. Regulation 5.23 establishes categories of toxic air contaminants.

ii. Standards/Operating Limits

TAC

Per Regulations 5.00 and 5.21, the owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis.

iii. Monitoring and Record Keeping

Emissions Calculation Methodology: The emissions were calculated using AP-42 emission factors.

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

TAC

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. Records shall be kept of MSDS, analysis of emissions and/or modeling results that demonstrate environmental acceptability. In addition, if a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

iv. Reporting

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

i. Emission Unit U9

i. Equipment

U9 Emission Points			
Emission Point	Description	Applicable Regulation(s)	Basis for Applicability
E31	Bead Blaster with Bag Filter. Make: Blast it All, Model: 6048-9-RPJ2-3.	7.08	Regulation 7.08 applies to each process operation that is the affected facility not otherwise regulated by other regulations of Regulation 7 and that commenced construction after September 1, 1976.
E32	Grinder. Make: Blanchard, Model: 11-20.		
E36	Shot Blast Machine with Baghouse. Make: LS Industries.		
E37	Vibradyne Deburring Machine. Make: LS Industries, Model: 4S.		
E34	Zyglo NDT System, Model: ZL-67.	5.00 5.01 5.02 5.20 5.21 5.22 5.23 7.25	Regulation 5.00 establishes definitions of terms used in the Strategic Toxic Air Reduction Program. Regulation 5.01 establishes general provisions for process equipment from which a toxic air contaminant is or may be emitted. Regulation 5.02 establishes the adoption and incorporation by reference of national emission standards for hazardous air pollutants. Regulation 5.20 establishes the methodology for determining the benchmark ambient concentration of a toxic air contaminant. Regulation 5.21 establishes the criteria for determining the environmental acceptability of emissions of toxic air contaminants. Regulation 5.22 establishes the procedures for determining the maximum ambient concentration of a toxic air contaminant. Regulation 5.23 establishes categories of toxic air contaminants. Regulation 7.25 establishes VOC standards for affected facilities constructed after June 13, 1979.
E39	Washer (Small), Make: MART, Model: CYCLONE 30.	6.18	Regulation 6.18 applies to cold cleaners, open top vapor degreasers, and conveyorized degreasers that use VOCs to remove soluble impurities from metal surfaces.

ii. Standards/Operating Limits

1) VOC

a) Per Regulation 7.25, Emission Points E34 and E2 are limited to VOC emissions of 5.0 tons per year. (The District believes that the 1,200 gallons VOC containing material usage will ensure the VOC emissions less than 5 tons during any calendar year. Therefore, in lieu of calculating VOC emissions, the company can easily demonstrate compliance with Specific Condition S1.a.i if the VOC containing material is less than 1,200 gallons during the calendar year. The gallon per year limit is based on the company using VOC containing materials that have 8.25 lb VOC/gal or less.)

b) Per Regulation 6.18, the owner or operator shall install, maintain, and operate the control equipment for Emission Point E39, shall observe specific operating requirements, and shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F).

2) PM

Regulation 7.08 limits PM emissions to 2.34 lb/hr each for Emission Points E31, E32, E36, and E37.

3) Opacity

Regulation 7.08 limits visible emissions to 20% opacity for Emission Points E31, E32, E36, and E37.

4) TAC

Per Regulations 5.00 and 5.21, the owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis.

iii. Monitoring and Record Keeping

Emissions Calculation Methodology: The emissions are based on the VOC and HAP content of the materials used.

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. Records shall be kept of the amount and type of coatings applied as well as method used on a monthly basis.

iv. Reporting

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.

III. Other Requirements

1. Temporary Sources: The source did not request to operate any temporary facilities.

2. Short Term Activities: The source did not report ant short term activities.

3. Emissions Trading: N/A

4. Operational Flexibility: The source did not request any operational flexibility for the emission point.

5. Compliance History:

Incident Date(s)	Regulation(s) Violated	Result
6/16/95	6.40	Settled

6. Insignificant Activities:

Equipment	Quantity	PTE (tpy)	Reg. Basis
Fuel burning equipment; 144 heaters, less than 1 MMBtu/hr capacity each	148	0.4 NO_x	Regulation 2.02, section 2.1.1
IA1 Main Employee Entrance (Bldg 25) boiler, 27 hp (0.069 MMBtu/hr)	1	0.1 NO_x	Regulation 2.02, section 2.1.1
IA1 GOC/Edgewood Guard Shack boiler, 64 hp (0.163 MMBtu/hr)	1	0.5 NO_x	Regulation 2.02, section 2.1.1
IA1 North Employee Entrance (Bldg 35) boiler, 134 hp (0.34 MMBtu/hr)	1	0.6 NO_x	Regulation 2.02, section 2.1.1
IA1 Emergency generators, Kohler, model John Deere 3029TF270, 64 hp each	3	0.5 NO_x	Regulation 2.02, section 2.1.1

Equipment	Quantity	PTE (tpy)	Reg. Basis
Lubricant and fuel oil storage, with fluids having a vapor pressure less than 10 mm Hg at 20°C	20	0.0001 VOC	Regulation 2.02, section 2.3.9.2
Brazing, soldering, or welding equipment, used for this type of metal joining operation	1	0.41 PM	Regulation 2.02, section 2.3.4
Dust collectors and fabric filters, which exhaust inside the building, with less than 1 tpy of PM	5	0.88 PM	Regulation 2.02, section 2.3.21
IA2 Non-halogenated cold solvent part degreasers, equipped with secondary reservoir for solvent.	15	0.8 VOC	Regulation 2.02, section 2.3.22
Moveable fuel tanks with a capacity <500 gallons, which are able to be relocated on the premises.	10	0.0001 VOC	Regulation 2.02, section 2.3.23
VOC storage vessels with a capacity <250 gallons	10	0.0001 VOC	Regulation 2.02, section 2.3.24
150 gal fuel storage tanks for emergency generator use, with a throughput < twice the tank capacity (Utility Building)	5	0.0001 VOC	Regulation 2.02, section 2.3.9.2
50 gal fuel storage tanks for emergency generator use, with a throughput < twice the tank capacity (Ashbottom, Fuel Farm, and Auxiliary)	3	0.0001 VOC	Regulation 2.02, section 2.3.9.2
Oil-water separators in use as BMP for stormwater and wastewater permits. Exempt based on the low vapor pressure of Jet-A fuel.	16	0.0003 VOC	Regulation 7.36, section 1
Grade Lane Hub – Diesel Tank (12,000 gal)	1	0.002 VOC	Regulation 2.02, section 2.3.9.2
Underground diesel storage tank (25,000 gal)	1	0.003 VOC	Regulation 2.02, section 2.3.9.2
Underground diesel storage tank (6,500 gal)	1	0.001 VOC	Regulation 2.02, section 2.3.9.2

Equipment	Quantity	PTE (tpy)	Reg. Basis
Underground diesel storage tank (6,500 gal)	1	0.001 VOC	Regulation 2.02, section 2.3.9.2
Underground diesel storage tank (2,000 gal)	1	0.001 VOC	Regulation 2.02, section 2.3.9.2
602.5 gal/hr Fuel Dispensing Operation (Diesel).	1	0.86 VOC	Exempt from Regulation 7.22 due to fuel vapor pressure less than 1.5 psia

1) Insignificant Activities identified in District Regulation 2.02, section 2, may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16, section 3.5.4.1.4.

2) Insignificant activities identified in District Regulation 2.02, section 2, shall comply with generally applicable requirements as required by Regulation 2.16, section 4.1.9.4

3) The District has determined pursuant to Regulation 2.16, section 4.1.9.4 that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.

4) Emissions from Insignificant Activities shall be reported with the annual Emission Inventory, submitted to District on or before April 15 of the following year.

5) In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential To Emit quantity listed in the Insignificant Activities table, as the annual emission for each piece of equipment, since the emissions from the source's Insignificant Activities are very minor in comparison to the plant wide emissions.

5) The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.

6) The company shall submit an updated list of insignificant activities that occurred during the preceding year pursuant to Regulation 2.16, section 4.3.5.3.6.

7) Title V Listing of "Trivial Activities" footnote #3: "….. Brazing, soldering, welding and cutting torches directly related to plant maintenance and upkeep and repair or maintenance shop activities that emit HASP metals are treated as trivial and listed separately in this appendix."

7. Basis of Regulation Applicability for IA Units

a. Emission Unit IA1

i. Equipment

IA1 Emission Points			
Emission Point	Description	Applicable Regulation(s)	Basis for Applicability
E40	One (1) natural gas boiler, Main Employee Entrance (Bldg 25), 27 hp	7.06	Regulation 7.06 applies to indirect heat exchangers.
E41	One (1) natural gas boiler, GOC/Edgewood Guard Shack, 64 hp		
E42	One (1) natural gas boiler, North Employee Entrance (Bldg 35), 134 hp		

ii. Standards/Operating Limits

1) SO_2

Regulation 7.06 limits sulfur dioxide emissions to 1.0 lb/MMBtu actual total heat input for combustion of liquid and gaseous fuels for each emission point in this unit.

2) PM

Regulation 7.06 limits particulate matter emissions to 0.56 lb/MMBtu actual total heat input for each emission point in this unit.

3) Opacity

Regulation 7.06 limits opacity to 20%.

iii. Monitoring and Record keeping

Emissions Calculation Methodology: The emissions are based on AP-42 emission factors for natural gas combustion.

1) SO_2

There are no monitoring or record keeping requirements for this pollutant. (A one-time PM and SO_2 compliance demonstration was performed for the boilers, using AP-42 emission factors and combusting natural gas, and the emission standards cannot be exceeded. Therefore, there are

no monitoring, record keeping, and reporting requirements for these boilers with respect to PM and SO_2 emission limits.)

2) PM

There are no monitoring or record keeping requirements for this pollutant. (A one-time PM and SO_2 compliance demonstration was performed for the boilers, using AP-42 emission factors and combusting natural gas, and the emission standards cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements for these boilers with respect to PM and SO_2 emission limits.)

3) Opacity

There are no monitoring or record keeping requirements for this pollutant. (The District has determined that using a natural gas fired boiler will inherently meet the 20% opacity standard. Therefore, the source is not required to perform periodic monitoring to demonstrate compliance with the opacity standard.)

iv. Reporting

1) SO_2

There are no reporting requirements for this equipment.

2) PM

There are no reporting requirements for this equipment.

3) Opacity

There are no reporting requirements for this equipment.

b. Emission Unit IA2

i. Equipment

IA2 Emission Points			
Emission Point	Description	Applicable Regulation(s)	Basis for Applicability

E46-E60	Fifteen (15) non-halogenated cold solvent part degreasers, equipped with secondary reservoir for solvent.	6.18	Regulation 6.18 applies to cold cleaners.

ii. Standards/Operating Limits

VOC

Per Regulation 6.18, the owner or operator shall install, maintain, and operate the control equipment for Emission Points E38 and E39, shall observe specific operating requirements, and shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F).

iii. Monitoring and Record keeping

Emissions Calculation Methodology: Emissions Calculation Methodology: The emissions are based on the VOC content of the materials used.

VOC

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 requires sufficient monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit.

iv. Reporting

VOC

Regulation 2.16, section 4.1.9.3 establishes reporting requirements to assure ongoing compliance with the terms and conditions of the permit.